

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10095-RWZ

TIMOTHY P. KEARNEY, JR., PRO SE)
Plaintiff,)

v.)

THE MAY DEPARTMENT STORES)
a.k.a FILENE'S, GREGORY)
JACKSON, ERIC VAN DER VALK)
AND SHAWN TUBMAN)

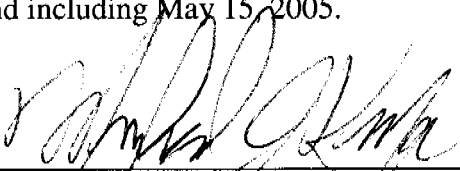
Defendants.

MOTION OF THE DEFENDANTS TO
ENLARGE TIME TO FILE ANSWER
AND/OR RESPONSIVE PLEADING

Now come the defendants, The May Department Stores a.k.a. Filene's, Gregory Jackson, Eric Van Der Valk and Shawn Tubman and hereby move to extend up to and including May 15, 2005 the time within which the defendants must file an answer and/or responsive pleading.

As good ground the defendants state they have only recently retained counsel and that the plaintiff will not be prejudiced by the brief extension requested herein.

WHEREFORE, the defendants respectfully request that the time for them to answer and/or responsively plead be enlarged up to and including May 15, 2005.




Michael J. Keefe, BBO No.: 263751
Attorney for defendants
Martin, Magnuson, McCarthy & Kenney
101 Merrimac Street, 7th Floor
Boston, MA 02114
617-227-3240

CERTIFICATE OF SERVICE

I, Michael J. Keefe, attorney for defendants, hereby certify on the 13th day of April, 2005, I served a copy of the foregoing, by certified mail, return receipt request to:

Timothy P. Kearney, Jr., Pro Se
100 Everett Street
Arlington, MA 02474

A handwritten signature in black ink, appearing to read "Michael J. Keefe", is written over a horizontal line.

Michael J. Keefe, BBO No.: 263751
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